

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STANLEY LIGAS, et al.,)	
)	
Plaintiffs,)	No. 05 C 4331
)	
vs.)	Chief Judge Holderman
)	
JULIE HAMOS, et al.,)	
)	
Defendants.)	

AGREED MOTION FOR THE ENTRY OF JUDGMENT ORDER

Pursuant to the Consent Decree (the “Decree”) approved by this Court on June 15, 2011 (Doc. Nos. 547, 549), Plaintiffs and Defendants respectfully move this Court to enter a Judgment Order for the payment of reasonable costs and expenses incurred by Class Counsel; as well as attorneys’ fees incurred by both Class Counsel and Intervenors Counsel, all in accordance with the express terms of the Decree. (A Proposed Order is attached as Exhibit A.)

The Decree provides that in full settlement of all out-of-pocket costs and expenses (not including attorneys’ fees) incurred by Class Counsel through approval of the Decree, Defendants shall reimburse Class Counsel their reasonable costs and expenses and that that amount shall be set forth in a Judgment Order to be entered by the Court, with one-half of that amount due in State Fiscal Year 2012 (which begins July 1, 2011) and one-half of that amount due in State Fiscal Year 2013 (which begins July 1, 2012). (Decree ¶38.) The Decree further provides that in full settlement of attorneys’ fees incurred both by Class Counsel and Intervenors’ Counsel, Defendants shall pay \$1,740,000.00 to Class Counsel and \$500,000.00 to Intervenors’ Counsel with one-half of those amounts due in State Fiscal Year 2012 (which begins July 1, 2011) and one-half of those amounts due in State Fiscal Year 2013 (which begins July 1, 2012). (*Id.*)

Pursuant to the Decree, Class Counsel has provided Defendants with information regarding their out-of-pocket costs and expenses and Defendants have agreed to payment in the total amount of \$463,920.63.

WHEREFORE, Plaintiffs and Defendants respectfully request that this Court enter the attached Judgment Order providing for payment in the total amount of \$463,920.63 to Class Counsel (as more fully set forth in the attached Proposed Order, Exhibit A), reflecting the agreed amount of reasonable costs and expenses incurred by Class Counsel that are reimbursable under Decree; as well as for the payment of \$1,740,000.00 in attorneys' fees to Class Counsel, and the payment of \$500,000.00 in attorneys' fees to Intervenors' Counsel.

Dated: June 29, 2011

Respectfully submitted,

For Plaintiffs	For Defendants
By: <u>/s/ Wendy N. Enerson</u>	By: <u>(with consent of) Brent D. Stratton</u>
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CERTIFICATE OF SERVICE

The undersigned, an attorney for the Plaintiffs, certifies that on June 29, 2011, she electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the counsel of record.

/s/ Wendy N. Enerson